

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:	)	
	)	Case No. 20-20494 GLT
Nicole L. Poole,	)	Chapter 13
<i>fka Nicole C. Weid</i>	)	
<i>Debtor</i>	)	
	)	Related to Docket No. 34 & 35
PNC Bank,	)	
<i>Movant</i>	)	
	)	
Vs.	)	
	)	
Nicole L. Poole,	)	
<i>fka Nicole C. Weid</i> and	)	
Ronda Winnecour, Trustee,	)	
<i>Respondents</i>	)	

**ANSWER TO MOTION FOR RELIEF FROM AUTOMATIC STAY**

AND NOW, comes the debtor, Nicole L. Poole, by and through her attorney, Kenneth Steidl, and Steidl and Steinberg, and respectfully represent as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. The debtor has paid the full monthly plan payment due for the month of July 2020 to the Chapter 13 Trustee. Therefore, at the present time, the debtor is only 1 plan payment behind, and that would be the month of June 2020. The debtor has just been approved for Social Security Disability and she will receive her first full payment from the Social Security Administration in August 2020. She plans to immediately pay the missing payment for June 2020, and she will then be fully current with these plan payments. In addition, now that she will be receiving Social Security Disability, she does not believe she will ever miss a payment to the Chapter 13 Trustee going forward.
8. Denied. As previously stated, the debtor is only 1 plan payment behind, which will be the month of June 2020. She has already paid in full the payment due for July 2020.
9. Denied. The only arrearage in this plan is one payment that is due for the month of June 2020, and that payment will be paid along with the August

payment before the Court hearing in this matter scheduled for August 26, 2020.

10. Admitted.

11. Admitted.

12. Admitted.

13. Admitted.

14. Denied. At the present time, the debtor is only 1 plan payment behind, which will be the payment due for June 2020. By the end of August 2020, the debtor believes that this plan will be fully current because she will pay the June and the August payments when she received her Social Security Disability payments which start in August.

15. Admitted.

WHEREFORE, the debtor, Nicole L. Poole, respectfully requests this Honorable Court to deny this Motion for Relief from Automatic Stay.

Respectfully submitted,

July 28, 2020

DATE

/s/ Kenneth Steidl

Kenneth Steidl, Esquire  
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